

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

PAMALA VINCENT, individually and as representative
of a Class of all those similarly situated,

Plaintiff,

vs.

LINDSEY MANAGEMENT CO., INC. A/K/A LINDSEY
MANAGEMENT COMPANY, INC.; ET AL.

Defendants.

Case No. 12-CV-210-JHP-PJC

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO MOTIONS FOR SUMMARY JUDGMENT**

Plaintiff hereby moves the Court for an order granting Plaintiff an additional fifteen (15) days, or until December 17, 2012, to respond to the pending Motions for Summary Judgment. The grounds for this motion are as follows:

1. On October 5, 2012, the Defendants, The Links at Mustang Creek Management Company, LLC, Lindsey and Associates, Inc., of Arkansas, Laura Wall, Jobe Patterson, Christy Patterson, Lindsey Management Co., Inc., and James E. Lindsey, filed Motions for Summary Judgment in this matter.

2. On October 19, 2012, the parties filed a Joint Stipulated Notice of Proposed Dates/Deadlines, wherein Plaintiff was to file response briefs to the pending motions for summary judgment by November 30, 2012.

3. Due to illness, Plaintiff's counsel is in need of additional time to complete the response briefs to the pending motions for summary judgment.

4. Plaintiff's counsel has conferred with counsel for Defendants regarding this request for additional time and Defendants' counsel has no objection.

5. Plaintiff's counsel has no objection to a similar extension of time for Defendants' reply briefs to the pending motions for summary judgment.

6. A proposed order is being submitted to the Court.

Accordingly, Plaintiff respectfully requests that this Court enter an order granting Plaintiff an additional fifteen (15) days, or until December 17, 2012, to respond to the pending Motions for Summary Judgment.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December, 2012, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Sidney G. Dunagan

Amy M. Stipe

Attorneys for Defendants

/s/ R. Stratton Taylor, OBA #10142